

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
v.	:	CRIMINAL NO. 22-142
LAYE SEKOU CAMARA	:	
a/k/a “K-1”	:	
a/k/a “Dragon Master”	:	

GOVERNMENT’S THIRD MONTHLY STATUS REPORT

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Linwood C. Wright, Jr. and Kelly M. Harrell, Assistant United States Attorneys for the district, pursuant to this Court’s October 3, 2023 order, respectfully submits its third monthly status report as follows:

1. In an effort to assure that the government fulfills its ongoing discovery obligations, the government has submitted relevant information on its foreign witnesses to Department of Justice officials for them to submit these witnesses’ identifiers to relevant agencies to determine what, if any, information about these witnesses is in the possession these agencies. Once that is known, the government will be in a better position to produce and make this information, and any other relevant information, available for delivery, if it exists. Because the government is forced to rely on the timetables of other agencies to make various determinations, it does not yet have a solid estimate on how long in total this process will take. One of the agencies from which information was sought advised the government that it does not possess responsive materials. On January 3, 2024, a second agency advised the government that it possesses information that might be responsive. The government now intends to review this information.

2. In order to secure the foreign witnesses for trial in this case, the responsible investigative agency has to allocate funds to facilitate intra-Liberia travel and other related necessities for these witnesses. These necessities include passports and other travel documents. The responsible investigative agency in this case is under a continuing funding resolution and it is uncertain when the United States Congress will allocate all the necessary funds to the investigative agency. The government is hopeful that these funds will be available in the reasonably foreseeable future and the necessary arrangements can be made to secure these witnesses for trial. The investigative agency has requested the necessary funds from its headquarters' war crimes unit. However, since the entire investigative agency is still under a continuing funding resolution, the investigative agency has yet to receive a response from its headquarters' war crimes unit. The investigative agency anticipates receiving a hopefully positive response from its headquarters' war crimes unit once the United States Congress passes a budget and the investigative agency is no longer operating under a continuing funding resolution. The investigative agency has been in touch with a nongovernmental organization which aids it in witness matters in this case. The investigative agency anticipates receiving an estimate from the nongovernmental organization of the costs relating to securing the witnesses. That said, although the investigative agency has yet to receive a cost estimate from the nongovernmental organization, it has been advised by the nongovernmental organization that the nongovernmental organization has been in touch with a number of the government's anticipated witnesses and has made some determinations as to which anticipated witnesses have passports. This is an ongoing and time-consuming process because some of the anticipated witnesses live in remote areas and thus are difficult to contact.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Linwood C. Wright, Jr.
LINWOOD C. WRIGHT, JR.
KELLY M. HARRELL
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Third Monthly Status Report, was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

PANTELLIS PALIVIDAS
ELLIS LEGAL, LLC
100 S. BROAD STREET SUITE 1910
PHILADELPHIA, PA 19110
ellis@ellis-legal.com

RICHARD J. FUSCHINO , JR.
LAW OFFICE OF RICHARD J. FUSCHINO
1600 LOCUST ST
PHILADELPHIA, PA 19103
rjf@fuschinolaw.com

/s/Linwood C. Wright, Jr.
LINWOOD C. WRIGHT, JR.
Assistant United States Attorney

DATED: January 4, 2024